

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SONYA LARSON,

Plaintiff

v.

C. A. No.: 1:19-CV-10203-IT

DAWN DORLAND PERRY,
COHEN BUSINESS LAW GROUP, PC and
JEFFREY A. COHEN, ESQUIRE,

Defendants.

AND

DAWN DORLAND PERRY

Plaintiff-in-Counterclaim

v.

SONYA LARSON

Defendant-in-Counterclaim

**DEFENDANT DAWN DORLAND PERRY'S ASSENTED TO
REQUEST FOR STATUS CONFERENCE**

Defendant and Plaintiff-in-Counterclaim requests a status conference in this matter for the purpose of setting a schedule for summary judgment briefing in this litigation. In support of this motion, Ms. Dorland states as follows:

1. This matter was referred to mediation with the Honorable Donald Cabell on October 25, 2021.
2. All parties participated in a mediation session with Judge Cabell on February 3, 2022. That session did not result in a settlement, but the parties continued to negotiate following that session.

3. Over the course of the following weeks, the parties continued to discuss potential resolution, including with the assistance of Judge Cabell.

4. Notwithstanding the parties' good faith efforts to negotiate a resolution of this matter, the settlement discussions were not successful.

5. Ms. Dorland intends to file a motion for summary judgment in this matter, for which there is currently no schedule.

6. In order to keep this litigation moving forward, Ms. Dorland respectfully requests that the Court set a status or scheduling conference for purposes of setting a schedule for summary judgment and any other deadlines that the Court deems reasonable at this time.

7. For scheduling purposes, Ms. Dorland's counsel states that she is not available for an in-person conference during the period of June 29 – July 6, 2022, due to a long-planned family vacation.

7. All parties assent to this motion.

WHEREFORE, Ms. Dorland respectfully requests that the Court set a conference for purposes of setting a schedule for summary judgment.

Respectfully,

DAWN DORLAND PERRY,

By her attorneys,

/s/ Suzanne Elovecky

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Dated: June 3, 2022

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on June 3, 2022.

/s/ Suzanne Elovecky

Suzanne Elovecky, Esq. (BBO # 670047)

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